|                     | STATES DISTRICT COURT |      | FILED<br>DISTRICT OURT |       |       | R T<br>N |
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|                     | Greenbelt Division    |      |                        |       |       |          |
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|                     |                       | : 1  |                        |       | _DEP  | UTY      |
| MICHELLE L. WHITE,  |                       |      |                        |       |       |          |
| Plaintiff,          |                       |      |                        |       |       |          |
|                     | )                     |      |                        |       |       |          |
| <b>v.</b>           | Civil Action          | No.: | JFM                    | I 03  | CV 20 | 5        |
| GLOBAL COMMERCE AND | )<br>)                |      |                        |       |       |          |
| INFORMATION, INC.,  | j                     |      |                        |       |       |          |

## STIPULATION AND ORDER REGARDING SUMMARY JUDGMENT BRIEFING SCHEDULE

Defendant.

Plaintiff Michelle White and Defendant Global Commerce and Information, Inc
(GCI) jointly submit this Stipulation and Order and respectfully request that the Court
modify the summary judgment briefing schedule in this case for the reasons stated below.

- 1 In its Scheduling Order dated February 10, 2003, the Court set a deadline for dispositive motions of this Friday, September 19, 2003
- In a Status Report submitted on August 22, 2003, the parties advised the Court that Defendant intends to file a motion for summary judgment and that Plaintiff plans to file a motion for partial summary judgment. Pursuant to Local Rule 105.2(c), the parties proposed the following briefing schedule.

Defendant's motion due: September 19

Plaintiff's opposition and cross- October 10

motion due

Defendant's reply due: October 27

Plaintiff's sur-reply due: November 7

This schedule was approved by the Court in an order dated August 22, 2003.

3. At this time, the parties are engaged in serious settlement discussions. The parties believe that with a short postponement of the summary judgment schedule, there is a very good likelihood of resolving the case amicably. In light of these discussions, the parties wish to conserve their resources and maximize the amount of resources available to devote to settling the case.

4. Accordingly, the parties jointly request that the Court modify the above summary judgment schedule as set forth below:

Defendant's motion due: October 6

Plaintiff's opposition and cross- October 27

motion due

Defendant's reply due:

November 12

Plaintiff's sur-reply due:

November 24

For all of the foregoing reasons, the parties respectfully request that the Court adopt the summary judgment briefing schedule set forth in Paragraph 4 above.

## **JACKSON LEWIS LLP**

SCHMELTZER, APTAKER & SHEPARD, P.C.

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IT IS SO ORDERED.

The Honorable J. Frederick Motz